



U.S. Department of Justice

United States Attorney Southern District of New York

The Jacob K. Javits Federal Building 26 Federal Plaza, 37th Floor New York, New York 10278

July 1, 2024

BY ECF

The Honorable Jennifer H. Rearden United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: United States v. Martin Handler, et al., 23 Cr. 004 (JHR)

Dear Judge Rearden:

Pursuant to the Court's December 4, 2023 Order (ECF No. 183), and consistent with the Government's letter of May 31, 2024 (ECF No. 299), the Government reaffirms to the Court and parties that it has completed its review of cellphones seized incident to arrest in this case and, as appropriate, produced materials extracted from those cellphones.

Continued retention of the these cellphones is necessary at this stage of the case, when it is unknown how, if at all, the defense will challenge the accuracy, reliability, or authenticity of the Government's data extraction, or how the defense will challenge chain-of-custody evidence concerning the cellphones.

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

By: <u>/s/</u>

Jacob R. Fiddelman / Stephanie Simon / Daniel H. Wolf Assistant United States Attorneys (212) 637-1024 / 2581 /2337

cc: All Counsel of Record